

Sedgwick<sub>LLP</sub>

Timothy D. Kevane

212-898-4008

timothy.kevane@sedgwicklaw.com

February 20, 2015

**Via Electronic Filing**

Hon. Colleen McMahon  
United States District Court  
500 Pearl Street, Room 1640  
New York, N.Y. 10007

Re: *Consolidated Edison Company of New York, Inc. v. Lexington Insurance Company*,  
Case No. 14-cv-06547-CM  
Our File No.: 02331-007950

Dear Judge McMahon:

We represent defendant Lexington Insurance Company.

On February 11, 2015, the Court granted Lexington's request for a 60-day extension of the March 3<sup>rd</sup> discovery completion date for the purpose of completing depositions.

Since then, we have received a request from third-parties (Aegis and EIM) for additional time to produce their documents in response to document subpoenas, which required production by February 23, 2015. We have no objection to their request, nor does the plaintiff Con Edison.

Accordingly, we request the Court's approval to allow this particular discovery to be completed by March 23, 2015.

Thank for Your Honor's consideration of this request.

Respectfully,

*Tim Kevane*

Timothy D. Kevane  
Sedgwick LLP

cc: David L. Elkind (via ECF)

MEMO ENDORSED

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